

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	Criminal No. 7:19-cr-00522
	§	
DANIEL GARCIA	§	

DEFENDANT’S UNOPPOSED MOTION FOR CONTINUANCE

COMES NOW, DANIEL GARCIA, by and through undersigned counsel, and respectfully moves to adopt, conform and have the benefit of applicable motions filed by any co-defendant indicted in the above-styled action. As grounds for this motion, defendant states as follows:

(1)

Defendant is charged in this case with three other defendants. One of those co-defendants, John Cuellar, has pled guilty. Attorneys for Mr. Richard Quintanilla and Arturo C. Cuellar, the remaining two Defendants, both agreed, at a telephone conference held October 10, 2019, that this continuance would be necessary. The Government has announced that it is unopposed to the requested continuance.

(2)

The Government has announced that discovery is ongoing and that it has as much as two terabytes of additional material to provide to the attorneys in this matter. It is impossible to make informed decisions in this case concerning pre-trial motions, pleas, or trial strategy without first receiving all available discovery. Because discovery remains an ongoing process, it is hereby

requested that a 90-day continuance be granted, and that motions and plea deadlines also be extended to provide for discovery to be completed.

(3)

Due to the complexity of this case and the nature of the charges and indictment, the above relief is necessary in the interest of justice, for due process of law, and for effective assistance of counsel.

WHEREFORE, Defendant respectfully requests that this Unopposed Motion for Continuance be granted.

Respectfully submitted,

/s/ Clay S. Conrad

Clay S. Conrad

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CERTIFICATE OF CONFERENCE

The Government has announced that it is UNOPPOSED to this Motion for Continuance. Attorneys for A.C. Cuellar and Richard Quintanilla are agreed that the requested continuance is necessary.

By: /s/ Clay S. Conrad
Clay S. Conrad

CERTIFICATE OF SERVICE

This is to certify that on October 14, 2019, a true and correct copy of this motion was served on all parties of record via ECF.

By: /s/ Clay S. Conrad
Clay S. Conrad